1 2	Remand responses to which are due by February 8, 2022. (ECF 21) The parties respectfully request a stay of discovery pending disposition of the pending	
3 4	Motion to Remand. Respectfully submitted this 27 th day of January, 2022.	
5 6	5 6	D this 27 th day of January, 2022.
7 8	7 McBRIDE HALL PARK	ER NELSON & ASSOCIATES, CHTD.
9 10 11 12 13 14 15 16 17 18	/s/ Chelsea R. Hueth ROBERT C. MCBRIDE, ESQ. Nevada Bar No. 7082 CHELSEA R. HUETH, ESQ. Nevada Bar No. 10904 Nevada 8329 W. Sunset Road, Suite 260 Las Vegas, Nevada 89113 Attorneys for Defendants, Bobby John Thomas, M.D., and Samson Wong, D.O. DATED this 26th day of January, 2022. DATE THE 70	DORE PARKER, III, ESQ. a Bar No. 4716 DGANY TURFLEY, ESQ. a Bar No. 13974 Professional Court, Suite 200 egas, Nevada 89128 eys for Defendants, sity Medical Center of Southern Nevada, a Flores, R.N., Kimberly Tauriello, R.N., Roser, R.N., Normita Rhodeos, R.N. D this 26 th day of January, 2022.
19		hael C. Kane
20 21	CHRISTOPHER CHOU, ESQ. MICH Nevada Bar No. 14853 Nevad	AEL C. KANE, ESQ. a Bar No. 10096
22	2 Nevada Bar No. 11795 Nevad	DLEY J. MYERS, ESQ. a Bar No. 8857
23	3 Las Vegas, Nevada 89101 Las Ve	outh 7 th Street, Suite 400 egas, Nevada 89101
24	Attorneys for United States of America Attorne ORDER	eys for Plaintiff
25	IT IS ORDERED that if the	
26	parties seek to stay discovery, they must file an appropriate	
27	motion or stipulation.	
28	DATED: 9:44 am, January 28, 2022 BRENDA WEKSLER UNITED STATES MAGISTRATE JUDGE	

1 **CERTIFICATE OF SERVICE** 2 I HEREBY CERTIFY that on the 27th day of January 2022, I served a true and correct copy 3 of the foregoing JOINT STATUS REPORT was served electronically to all parties of interest 4 through the Court's CM/ECF system as follows: 5 6 Michael C. Kane, Esq. Theodore Parker, III, Esq. 7 Bradley J. Myers, Esq. Mahogany Turfley, Esq. THE702FIRM PARKER NELSON & ASSOCIATES, CHTD. 8 400 South Seventh Street, Suite 400 2460 Professional Court, Suite 200 9 Las Vegas, Nevada 89101 Las Vegas, Nevada 89128 Attorneys for Plaintiff Attorneys for Defendants, 10 University Medical Center of Southern Nevada, Maylyn Flores, R.N., Kimberly Tauriello, R.N., 11 Haley Roser, R.N., Normita Rhodeos, R.N. 12 CHRISTOPHER CHIOU 13 Acting United States Attorney District of Nevada 14 **BRIANNA SMITH** Assistant United States Attorney 15 501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101 16 Brianna.Smith@usdoj.gov Attorneys for the United States 17 18 /s/ Lauren Smith An Employee of McBRIDE HALL 19 20 21 22 23 24 25 26 27 28

From: <u>Mahogany Turfley</u>

To: Mike Kane; Smith, Brianna (USANV); Chelsea R. Hueth

Cc: <u>Lauren Smith; Amber Casteel; Staci Ibarra</u>

Subject: RE: Soto-Gonzalez v. Thomas et al -- Draft Joint Status Report

Date: Thursday, January 27, 2022 8:26:04 AM

Attachments: <u>image001.png</u>

image002.png

Thank you, Chelsea. You may use my electronic signature,

Kind Regards,



Mahogany Turfley., Esq. 2460 Professional Court, Suite 200 Las Vegas, Nevada 89128 (702) 868-8005 (direct line) (702) 335-7031 (Cellular Phone) Main No. (702) 868-8000 Fax No. (702) 868-8001

From: Mike Kane <Mike@the702firm.com>
Sent: Wednesday, January 26, 2022 9:48 PM

To: Smith, Brianna (USANV) <Brianna.Smith@usdoj.gov>; Chelsea R. Hueth <crhueth@mcbridehall.com>; Mahogany Turfley <mturfley@pnalaw.net>

Cc: Lauren Smith <lsmith@mcbridehall.com>; Amber Casteel <Amber@the702firm.com>; Staci lbarra <Slbarra@pnalaw.net>

Subject: Re: Soto-Gonzalez v. Thomas et al -- Draft Joint Status Report

Thanks Chelsea for drafting. I'm fine with this.

Get Outlook for iOS

From: Smith, Brianna (USANV) < Brianna.Smith@usdoj.gov>

Sent: Wednesday, January 26, 2022 4:32:03 PM

To: Chelsea R. Hueth <<u>crhueth@mcbridehall.com</u>>; Mike Kane <<u>Mike@the702firm.com</u>>; mturfley@pnalaw.net <mturfley@pnalaw.net>

Cc: Lauren Smith < ! Amber Casteel < Amber@the702firm.com; sibarra@pnalaw.net < sibarra@pnalaw.net <a href="mailto:sibarra@pnalaw.

Subject: RE: Soto-Gonzalez v. Thomas et al -- Draft Joint Status Report

Chelsea,

I am fine with your proposed status report. The only comment I have is that the court may want a separate stipulation from the parties agreeing to stay discovery but the magistrate may well say that when she receives the status report.

Brianna

From: Chelsea R. Hueth <crhueth@mcbridehall.com>

Sent: Wednesday, January 26, 2022 12:26 PM

To: Smith, Brianna (USANV) < BSmith3@usa.doj.gov">BSmith3@usa.doj.gov>; Mike Kane < Mike@the702firm.com>;

mturfley@pnalaw.net

Cc: Lauren Smith < smith smith smith@mcbridehall.com; Amber Casteel Amber@the702firm.com;

sibarra@pnalaw.net

Subject: [EXTERNAL] Soto-Gonzalez v. Thomas et al -- Draft Joint Status Report

Dear All,

We have a joint status report due tomorrow. Attached please find a draft for your review and editing. I admittedly do not have much experience in Federal Court so I took a stab at the Report in light of the pending motions.

Thanks,

Chelsea

Chelsea R. Hueth, Esq.
<a href="mailto:com/mcbridehall.com/mcb

8329 West Sunset Road

Suite 260

Las Vegas, Nevada 89113 Telephone: (702) 792-5855

Facsimile: (702) 796-5855



MCBRIDE HALL

ATTORNEYS AT LAW

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